**BEFORE THE**

**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Transource Pennsylvania, LLC :

for approval of the Siting and Construction of the : A-2017-2640195

230 kV Transmission Line Associated with the : A-2017-2640200

Independence Energy Connection - East and West Projects :

in portions of York and Franklin Counties, Pennsylvania. :

 :

Petition of Transource Pennsylvania, LLC :

for a finding that a building to shelter control equipment :

at the Rice Substation in Franklin County, Pennsylvania : P-2018-3001878

is reasonably necessary for the convenience or welfare of :

the public. :

 :

Petition of Transource Pennsylvania, LLC :

for a finding that a building to shelter control equipment :

at the Furnace Run Substation in York County, : P-2018-3001883

Pennsylvania is reasonably necessary for the convenience :

or welfare of the public. :

 :

Application of Transource Pennsylvania, LLC :

for approval to acquire a certain portion of the lands of :

various landowners in York and Franklin Counties, :

Pennsylvania for the siting and construction of the 230 Kv : A-2018-3001881,

Transmission Line associated with the Independence Energy : *et al.*

Connection – East and West Projects as necessary or proper :

for the service, accommodation, convenience or safety of :

the public. :

**ORDER, GRANTING IN PART AND DENYING IN PART,**

**MOTION OF STOP TRANSOURCE FRANKLIN COUNTY**

**TO COMPEL ANSWERS TO DISCOVERY REQUESTS**

**Introduction**

 Initially, we note that these consolidated cases have a lengthy procedural history which will grow significantly as the cases progress towards their conclusion in these proceedings before the Commission. Therefore, for purposes of Stop Transource Franklin County’s Motion to Compel Complete Discovery Responses and Transource’s Answer to the Motion, we will not discuss the procedural history of these cases but will instead focus on the procedural history directly relevant to disposing of the Motion. We will also paraphrase the language of the Motion and Answer to the Motion as needed, and we will omit specific page citations to those submissions due to considerations of convenience and brevity.

**1. Stop Transource Franklin County’s Motion**

 On August 31, 2018, Stop Transource Franklin County (STFC) filed a Motion to Compel Complete Discovery Responses from Transource Pennsylvania, LLC (Transource). In the Motion, STFC contends that Transource has failed to provide complete responses to certain discovery requests of STFC. Specifically, STFC cites the following alleged failures to provide complete discovery:

**STFC’s Request for Production No. 5**

 STFC contented that Transource has failed to provide complete discovery responses concerning the following studies conducted by Transource:

 1) Bald Eagle Nest Survey

 2) Lance leaf buckthorn surveys

 3) Northeastern bulrush surveys

 4) Cultural resource surveys

 5) Bat surveys

 6) Eastern spadefoot toad habitat screening

 7) Wetland delineation surveys

 8) Property boundary surveys

 9) Soil borings

In its Answer to the Motion, Transource states that STFC appears to be asking that Transource PA be required to provide draft copies of the reports before they are final. Transource further states that it is not reasonable to require Transource PA to provide incomplete reports as they are being drafted. Among other disadvantages, producing draft reports before they are complete would disclose Company strategy and litigation preparation activities. Moreover, draft reports may not contain all the information that would be required prior to filing with the appropriate federal or state agency.

Transource also contends that it is not reasonable to require a party to provide drafts of documents when the party has agreed to provide the final documents after they have been completed, reviewed, and submitted to the appropriate agency. It would create substantial confusion to require a Company to provide drafts of documents that may change before the final document is produced, and then have every change be subject to review about why the change was made. This could be particularly confusing to agencies that will ultimately review and approve the reports. Notably, the partially completed analysis may lead to unjustified assumptions or conclusions simply because they are not based on sufficiently complete information and completed analysis. There is no countervailing need for STFC to receive the requested materials prior to their completion.

STFC also contends that Transource is refusing to disclose information requested by Request for Production No. 5, relating to the Pennsylvania Historic and Museum Commission (PHMC). STFC contends that Transource inaccurately labels such information as confidential and therefore not subject to disclosure. STFC contends that, even is such information were confidential, Transource’s information is protected from unnecessary disclosure by a Protective Order which was previously granted by the Presiding Officers in this case.

In its Answer to the Motion, Transource states that the PHMC information is subject to a confidentiality agreement between PHMC and Transource. Transource further states that the Protective Order entered in this case does not adequately protect Transource, and that the Protective Order in this case actually prohibits the disclosure of the PHMC information.

**STFC’s Request for Production No. 26.**

STFC requested that Transource produce all documents that refer or relate to the location of all water wells that are hydrologically connected to the proposed right of way. Transource responded that, to the Company’s knowledge, there are no water wells within the proposed right of way. STFC contends that the response is not clear enough and needs to be supplemented. Transource states that it will supplement its response to more clearly explain its answer.

**STFC’s Interrogatory No. 16**

 STFC requested that Transource describe and identify all of the projects that AEP and GPE annually manage and what the dollar amount of those efficiency projects as referenced by Ms. Simmons on P.9, line 19. Transource responded

Please refer to Ms. Simmons' testimony at page 9, line 19. The statement indicating that AEP and GPE annually manage more than $2 billion in projects and have extensive experience in projects of a magnitude comparable to the Independence Energy Connection Project refers to transmission projects in general, and is not limited to market efficiency projects. General information about these projects, which varies over time, is available publicly, for example, at [http://aeptransmission.com/].

Transource contends that the above response is sufficient, while STFC disagrees.

**The issue of Verifications to discovery requests**

 STFC states that Transource has not provided signed Verification forms to its discovery responses, as required by law. Transource states that it will provide those forms by September 6, 2018.

**2. Legal Standard**

Under the Commission’s regulations, the scope of discovery is broad. Section 5.321 outlines the scope of discovery as follows:

(c) *Scope*. Subject to this subchapter, a party may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of another party, including the existence, description, nature, content, custody, condition and location of any books, documents, or other tangible things and the identity and location of persons having knowledge of a discoverable matter. It is not ground for objection that the information sought will be inadmissible at hearing if the information sought appears reasonably calculated to lead to the discovery of admissible evidence.

52 Pa. Code § 5.321(c). Additionally, information is relevant if it tends to establish a material fact, tends to make a fact at issue more or less probable, or supports a reasonable inference or presumption regarding a material fact. Smith v. Morrison, 47 A.3d 131 (Pa. Super. 2012), app. denied, 57 A.3d 71 (Pa. 2012). Relevancy in discovery is broader than the standard used for admission of evidence at a hearing. Com. v. TAP Pharmaceutical Products, Inc., 904 A.2d 986 (Pa. Cmwlth. 2006). As stated above, the information requested must appear reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321. The party objecting to discovery has the burden to establish that the requested information is not relevant or discoverable. Koken v. One Beacon Insurance Co., 911 A.2d 1021 (Pa. Cmwlth. 2006).

**3. Disposition**

 With regard to the following studies conducted by Transource:

 1) Bald Eagle Nest Survey

 2) Lance leaf buckthorn surveys

 3) Northeastern bulrush surveys

 4) Cultural resource surveys

 5) Bat surveys

 6) Eastern spadefoot toad habitat screening

 7) Wetland delineation surveys

 8) Property boundary surveys

 9) Soil borings

STFC requested, in Request for Production No. 5, all documents that refer to, relate to, or constitute in any way Investigation Materials pertaining to the Project Study Area. However, Transource correctly notes that the Commission’s Regulations place limits on such discovery:

With respect to the representative of a party other than the party’s attorney, discovery may not include disclosure of his mental impressions, conclusions or opinions respecting the value or merit of a claim or defense or respecting the strategy, tactics or preliminary or draft versions of written testimony or exhibits, whether or not final versions of the testimony or exhibits are offered into evidence.

52 Pa. Code § 5.323(a). Given these restrictions, we will not require Transource to disclose any of its investigative notes, preliminary reports, or other notes of any testing concerning the above areas of inquiry. We will, however, to the extent not already provided, require Transource to provide the data and information used by its testers in running tests in the above areas of inquiry.

 With regard to the PHMC information, we reject Transource’s assertions that such discovery is prohibited by confidentiality agreements. Any agreement between PHMC and Transource is not binding upon a court or administrative tribunal. We therefore see no reason for Transource to avoid providing such information. To the extent the PHMC has a confidentiality agreement with Transource, our Order in this regard supersedes such an agreement as Transource is being legally compelled to provide the information in this proceeding. To the extent that PHMC might object, it is free to intervene in this proceeding in that regard.

 With regard to STFC’s Request for Production No. 26, it seems that the parties may be arguing over nothing more than semantics. Moreover, Transource has agreed to clarify its responses in that regard. If the clarified answers are still insufficient as far as STFC is concerned, STFC may file a new Motion in that regard.

 With regard to Interrogatory No. 16, although Transource has provided an aggregate total value of projects managed by AEP and GPE, it has not individually identified the specific projects or project value totals as called for by the Interrogatory. We conclude that the request is reasonable, and is reasonably calculated to lead to the discovery of admissible evidence and that the request must therefore be answered completely.

 Finally, we note that Transource is obligated to provide written Verification forms to its discovery responses, and has agreed to do so.

ORDER

 THEREFORE,

 IT IS ORDERED:

1. That the Motion of Stop Transource Franklin County, to Compel additional answers to Request for Production of Documents No. 5, is granted in part, as follows:

 a) Within 10 days of the date of this Order, Transource Pennsylvania, LLC shall provide the data and information used by its testing personnel conducting the following tests or surveys:

 1) Bald Eagle Nest Survey

 2) Lance leaf buckthorn surveys

 3) Northeastern bulrush surveys

 4) Cultural resource surveys

 5) Bat surveys

 6) Eastern spadefoot toad habitat screening

 7) Wetland delineation surveys

 8) Property boundary surveys

 9) Soil borings

 b) Within 10 days of the date of this Order, Transource Pennsylvania, LLC shall provide all of the requested information relating to the Pennsylvania Historic and Museum Commission.

1. That That the Motion of Stop Transource Franklin County, to Compel additional answers to Request for Production of Documents No. 5, is denied in part, and that Transource Pennsylvania, LLC is not required to disclose any of its investigative notes, preliminary reports, or other notes of any testing concerning the areas of inquiry discussed in Ordering Paragraph Number 1 above.
2. That the Motion of Stop Transource Franklin County, to Compel additional answers to Request for Production of Documents No. 26 is granted, and that Transource Pennsylvania LLC shall provide a supplemental response(s), indicating whether any water wells are hydrologically connected to the proposed right of way, and, if so, further supplementing the response(s) to identify any such water wells.
3. That the Motion of Stop Transource Franklin County, to Compel additional answers to Interrogatory No. 16 is granted, and that Transource Pennsylvania LLC shall provide a supplemental response(s), specifically identifying by name, date, location and other identifying information, all of the individual projects that AEP and GPE annually manage and what the dollar amount each of those efficiency projects is.
4. That Transource shall provide written Verification forms to all of its responses to Stop Transource Franklin County’s discovery requests.

Date: September 24, 2018 /s/

 Elizabeth H. Barnes

 Administrative Law Judge

 /s/

 Andrew M. Calvelli

 Administrative Law Judge

**A-2017-2640195 & A-2017-2640200 ET AL- APPLICATION OF TRANSOURCE PENNSLYVANIA, LLC. FOR APPROVAL OF THE SITING AND CONSTRUCTION OF THE 230KV TRANSMISSION LINE ASSOCIATED WITH THE INDEPENDENCE ENERGY CONNECTION-EAST & WEST PROJECTS IN PORTIONS OF YORK & FRANKLIN COUNTIES.**

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DOUG MCKOY11011 GIPE ROADCHANCEFORD PA 17322CRAIG SANSONETTI PRESIDENTMARYLAND & PENNSYLVANIA RAILROAD PRESERVATION SOCIETYPO BOX 2262YORK PA 17405**717.862.3259**DAVID MILLER
SUSAN MILLERMILLERS FUEL SUPPLYPO BOX 3553068 DELTA RDAIRVILLE PA 17302JIM STRACK2010 GARNET RDYORK PA 17403
LINDA A DICKINSON63 DOWNS AVEAIRVILLE PA 17302
JIM HERSHEY49 STRAWBRIDGE RDNEW PARK PA 17352
JENNIFER RUMBAUGH

5905 BUTTERMILK RD

WAYNESBORO PA 17268

GARY MINK
STEVEN MINK220 GROVE RDSTEWARTSTOWN PA 17363

COLT MARTIN
KRISTYN MARTIN
8020 HIDDEN VALLEY RD
WAYNESBORO PA 17268

DEBORAH PFLAGER

133 MYRTLE AVE

WAYNESBORO PA 17268

MARIA WHALEN

PETER WHALEN

12 MCCOY LN

CARLISLE PA 17105

KRISTI TAYLOR
118 GORAM RD
BROGUE PA 17309

KIRA ROHRER
1110 VILLAGE RD
LANCASTER PA 17602

KATHLEEN TOMPKINS
1056 MUDDY CREEK RD
AIRVILLE PA 17302

PATRICE TAYLOR
183 BUECKER RD
DELTA PA 17314

GUILDFORD TOWNSHIP SUPERVISORS
115 SPRING VALLEY RD
CHAMBERSBURG PA 17201

ASHLEY HOSPELHORN
8010 HIDDEN VALLEY LN
WAYNESBORO PA 17268

ASHLEY HOSPELHORN
116 WEST 3RD STREET
WAYNESBORO PA 17268

DM FARMS LLC
BRIAN BECHBILL
13689 DREAM HIGHWAY
NEWBURG PA 17240

CATHY PRIESTON
263 WESTOVER WAY
CHAMBERSBURG PA 17202

DANIEL LONG
6405 NUNNERY RD

WAYNESBORO PA 17268

LANTZ SOURBIER
LAURA SOURBIER
64 EDGEWOOD CIR

CHAMBERSBURG PA 17202

CONNIE HAIR
MICHAEL HAIR
1331 SPRINGVIEW DR
CHAMBERSBURG PA 17202

REBECCA CAMPBELL
125 REED RD
AIRVILLE PA 17302

KAREN BENEDICT
RODNEY MYER
5413 MANHEIM RD
WAYNESBORO PA 17268

SUZANNE RANDELL
4324 FETTERHOFF CHAPEL RD
CHAMBERSBURG PA 17202

DALE & BARBARA TORBET

405 THRONE RD

FAWN GROVE PA 17321

ROBERT BURCHETT

JUDY BURCHETT

THOMAS BURCHETT

STACY BURCHETT

175 FROSTY MILL RD

AIRVILLE PA 17302

JOSEPH & BARBARA LAPP

142 CONOWINGO RD

QUARRYVILLE PA 17566

MERVIN & GLADYS MILLER

95 BURNS RD

BROGUE PA 17309

AMOS & ELIZABETH ESH

460A STRASBURG RD

PARADISE PA 17562

WILLIAM & JANE PETERS

2062 DRUID PARK DR

BALTIMORE MD 21211

BURTON FAMILY LP

3731 ABINGDON BEACH RD

ABINGDON MD 21009

GLEN BRADLEY

825 CEDAR VALLEY RD

NEW PARK PA 17352

D ARTHUR GROVE

DAVID R GROVE

489 DAVIS RD

NEW PARK PA 17352

RGRG PARTNERS

C/O RICHARD WILSON

1407 THISTLEWOOD LN

STEWARTSTOWN PA 17363

JEFFERSON & LAURA BRACEY

815 CEDAR VALLEY RD

NEW PARK PA 17352

BARLEY FARMS LP

175 CHESTNUT GROVE RD

CONESTOGA PA 17516

TROY KLINE

4886 MILL RD

BROGUE PA 17309

JOHN BLAIR

11611 PRICES CHURCH RD

WAYNESBORO PA 17268

MARY ANN & DUWAYNE FOX

6977 IRON BRIDGE RD

WAYNESBORO PA 17268

DONALD & BEVERLY FAHRNEY

9249 HARLEE RD

WAYNESBORO PA 17268

JACK & EMILY MARTIN

12574 POLKTOWN RD

WAYNESBORO PA 17268

JASON & MEGAN Martin

5102 POLKTOWN RD

WAYNESBORO PA 17268

JANE ZEIGER

5886 HESS BENEDICT RD

WAYNESBORO PA 17268

DONALD & ISABELL HESS

5215 HESS BENEDICT RD

WAYNESBORO PA 17268

DENVER & KATRINA MARTIN

6973 NUNNERY RD

WAYNESBORO PA 17268

JOSEPH WEAGLEY

6413 MARSH RD

WAYNESBORO PA 17268

DANIEL & ELAINE ESHELMAN

13310 N. HOOVERS MILL RD

WAYNESBORO PA 17268

ROGER & JOYCE DILLER

5505 OLDE SCOTLAND RD

SHIPPENSBURG PA 17257

GBR LINCOLN HWY, LLC ET AL

150 TARRYTOWN RD

WHITE PLAINS NY 10591

SUMMIT PARTNERS, LLC

100 COLONIAL WAY

WEST CHESTER PA 19382

JASON & ROSALIE HOSTETTER

2048 GUILFORD STATION RD

CHAMBERSBURG PA 17202

DARRYL BENDER

5079 YOHE RD

WAYNESBORO PA 17268

DONNA BENDER

1013 S FIFTH ST

CHAMBERSBURG PA 17202

SALT CREEK PARTNERS, LLC

1112 KENNEBEC DR

CHAMBERSBURG PA 17201

CHARLES MELLOTT

9702 WAYNE HWY

WAYNESBORO PA 17268

RONALD & DORIS STONER

11623 KOONS RD

WAYNESBORO PA 17268

HAROLD WENGER LIVING TRUST

C/O ELVA WENGER

2146 CIDER PRESS RD

CHAMBERSBURG PA 17202

JOHN & ALLISON STEIGER

5465 HESS BENEDICT RD

WAYNESBORO PA 17268

IVAN & ELLEN HORST

2732 SOLLENBERGER DR

CHAMBERSBURG PA 17202

GUILFORD WATER AUTHORITY

115 SPRING VALLEY RD

CHAMBERSBURG PA 17202

KENNETH & MARIE LEHMAN

6403 HESS BENEDICT RD

WAYNESBORO PA 17268

DONALD & DENISE MARTIN

1946 NEWCOMER RD

CHAMBERSBURG PA 17202

WILLIAM & DIANE NITTERHOUSE

1130 CIDER PRESS RD

CHAMBERSBURG PA 17202

LEMMA & O’CONNOR INVESTORS, LLC

3645 FOX HILL DR

CHAMBERSBURG PA 17202

ROY & REGINA MARTIN

4925 SHADY LN

WAYNESBORO PA 17268

CHAMBERSBURG AREA SCHOOL DISTRICT

511 S. SIXTH ST

CHAMBERSBURG PA 17202

CHARLES DILLER

90 MENNO VILLAGE

CHAMBERSBURG PA 17202

JAMES & MABLE DILLER

552 KOHLER RD

CHAMBERSBURG PA 17202

JOHN & MARGARET DILLER

550 KOHLER RD

CHAMBERSBURG PA 17202

MARY & CHARLES HENRY

MARION CARMACK

D YVONNE FRANK

506 SOUTH EDWARDS AVE

CHAMBERSBURG PA 17202

CHAMBERSBURG MALL REALTY LLC

150 GREAT NECK RD STE 304

GREAT NECK NY 11021

CHAMBERSBURG CH LLC

88 N 2ND STREET STE 100

HARRISBURG PA 17102

CHAMBERSBURG NASSIM LLC

1265 DRUMMERS LN STE 209

WAYNE PA 19087

MAHLON & DEBRA EBY

6685 ANTHONY HWY

WAYNESBORO PA 17268

RICHARD & AGNES LESHER

1126 CIDER PRESS RD

CHAMBERSBURG PA 17202

LAVERNE & ELLEN MARTIN

14578 WAYNE HWY

WAYNESBORO PA 17268

SAMUEL & MANDY JONES

7583 LYONS RD

WAYNESBORO PA 17268

CHARLES STAMY FOX

37 FIFTH AVENUE

CHAMBERSBURG PA 17201

MARLIN & CARRIE MARTIN

7665 ANTHONY HWY

WAYNESBORO PA 17268

OWLS CLUB, INC.

87 W MAIN ST

WAYNESBORO PA 17268

BRUCE NEIBERT JR

7353 IRON BRIDGE RD

WAYNESBORO PA 17268

LOWES HOME CENTERS, INC.

1600 LINCOLN WAY EAST

CHAMBERSBURG PA 17202

KEITH BENEDICT

7366 BRECHBILL LOOP RD

CHAMBERSBURG PA 17202

DEREK BENEDICT

1883 RAGGED EDGE RD

CHAMBERSBURG PA 17202

DARED BENEDICT

3210 CHURCH RD

CHAMBERSBURG PA 17202

PATRIOT FEDERAL CREDIT UNION

800 WAYNE AVE

CHAMBERSBURG PA 17201

CHARLES & EDNA FOX

37 FIFTH AVENUE

CHAMBERSBURG PA 17202

TUNDE TIJANI

503 BROOKVIEW DR

GREENCASTLE PA 17225

LAMAR & ESTHER HORST

11599 KOONS RD

WAYNESBORO PA 17268

IVAN & RUBY BENEDICT

3307 COLLEGE DR

CHAMBERSBURG PA 17202

RICHARD & FERN PECK

4017 ALTENWALD RD

WAYNESBORO PA 17268

MYRON & FERN MILLER

9180 GOODS DAM RD

WAYNESBORO PA 17268

WEST PENN POWER COMPANY

76 S MAIN ST

AKRON OH 44308

IESI PA BLUE RIDGE LANDFILL CORP

PO BOX 399

SCOTLAND PA 17254

KIMBERLY & DAVID NEIBERT

14898 WAYNE HWY

WAYNESBORO PA 17268

WILLIS LESHER

1153 SWAMP FOX RD

CHAMBERSBURG PA 17202

JOHN & EUNICE RUDOLPH

7270 BUTTERMILK RD

WAYNESBORO PA 17268

KYLE & KELLY SCHINDEL

22032 ROCKY FORGE RD

HAGERSTOWN MD 21740

LAMAR & EDNA RUDOLPH

5401 MANHEIM RD

WAYNESBORO PA 17268

DANIEL & DOREEN STRITE

6032 BUTTERMILK RD

WAYNESBORO PA 17268

KAREN BENEDICT

RODNEY MEYER

5419 MANHEIM RD

WAYNESBORO PA 17268

JOHN & PENNY GARBER

7787 BURKHOLDER RD

WAYNESBORO PA 17268

GERALD & JENNIFER ZEIGLER

PO BOX 121

WAYNESBORO PA 17268

MARK & SALLY GAYMAN

5460 STAMEY HILL RD

WAYNESBORO PA 17268

EDWIN & DAWN SHANK

3854 OLDE SCOTLAND RD

CHAMBERSBURG PA 17202

REK PROPERTIES, LLC

1658 LINCOLN WAY EAST

CHAMBERSBURG PA 17202

LYNN & MARY ETTER

5167 OLDE SCOTLAND RD

SHIPPENSBURG PA 17257

MARGARET MOWER

683 MOWER RD

CHAMBERSBURG PA 17202

J RAY & LINDA GEESAMAN

4986 MANHEIM RD

WAYNESBORO PA 17268

ELAM & MARY REIFF

275 GOODHART RD

SHIPPENSBURG PA 17257

CLARA & DANIEL BENEDICT

4574 ALTENWALD RD

WAYNESBORO PA 17268

J NORMAN & BONNA JANE DILLER

20660 MILLERS CHURCH RD

HAGERSTOWN MD 21742

GLENN & ELAINE EBERLY

78 GARAGE PLACE RD

GHENT NY 12075

DOUGLAS & NELLIE STRALEY

89 CHERRY AVENUE

CHAMBERSBURG PA 17202

JOSHUA & NICOLE DILLER

4913 OLDE SCOTLAND RD

SHIPPENSBURG PA 17257

TAMMY JO & RODERICK C.B. SALTER

MICHAEL & TAMRA FREDERICK

1218 GOLDEN WEST WAY

LUSBY MD 20657

KEVIN & FAYE GAYMAN

9611 PINE ROAD

ORRSTOWN PA 17244

GRANT GAYMAN

11742 GEHR RD

WAYNESBORO PA 17268

PAUL & MARY BAKER

4270 OAK HILL RD

WAYNESBORO PA 17268

FORRESTER FARMS, II, INC

3162 WHITE CHURCH RD

CHAMBERSBURG PA 17202

MARVIN & LOIS MARTIN

7016 MENTZER GAP RD

WAYNESBORO PA 17268

FRANKLIN COUNTY VISITORS BUREAU C/O JANET POLLARD
37 SOUTH MAIN ST STE 100
CHAMBERSBURG PA 17201

CLINTON BARKDOLL ESQUIRE

KULLA, BARKDOLL & STEWART, P.C.

9 EAST MAIN STREET

WAYNESBORO PA  17268

**717.762.3374**